

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-10232NMG

JAMES KEHOE
Plaintiff

V.

MI-JACK PRODUCTS, INC.,
FANTUZZI REGGIANE AND
FANTUZZI USA, INC.
Defendants

PROPOSED JOINT STATEMENT UNDER LOCAL RULE 16.1

NOW comes the parties in the above entitled matter, by and
through their attorneys, and submit their Joint Statement under Local Rule
16.1 as follows:

A. PHASE 1: For developing information needed for a realistic assessment of
the case.

1. Answers to Interrogatories filed by May 20, 2005.
Plaintiff's Answers to Expert Interrogatories filed by September 16, 2005
Defendant's Answers to Expert Interrogatories filed by October 21, 2005.
2. Responses to first Request For Production of Documents filed by May 20,
2005
Responses to any Second Request For Production of Documents filed by
August 12, 2005
3. First Request For Admissions filed by July 15, 2005
4. Witness/Factual Depositions conducted by September 16, 2005.

5. Motions for Summary Judgment filed after PHASE 1 is completed by December 31, 2005. If further expert depositions are necessary for the resolution of any Motion for Summary Judgment, the parties will file a request to extend the deadline for filing by December 15, 2005.
6. Motions to Amend the pleadings filed by October 31, 2005.
7. Motion to Amend to add parties filed as soon as the party can reasonably be expected to have become aware of the identity of the new party, but no later than October 31, 2005.
- B. PHASE 2: For information needed to prepare for trial.
 1. Depositions of experts must be noticed by November 2, 2005.
 2. Additional Requests For Admissions filed by September 4, 2005.


SETTLEMENT PROPOSALS:

In compliance with Local Rule 16.1, counsel for both parties have conferred with respect to settlement before the scheduling conference and have been unable to reach an agreement.

CERTIFICATION OF PARTIES AND THEIR COUNSEL:

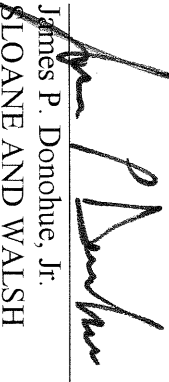
The parties and their counsel herein certify that they have conferred with a view to establishing a budget for the costs of conducting the full course, and various alternative courses, of this litigation, and they have considered and discussed the resolution of this litigation through the use of alternative dispute resolution programs as outlined in Local Rule 16.4.

Plaintiff,
By his attorney



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Defendant,
Mi-Jack Products, Inc.
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